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December 10, 1999

Ms. Jane Henney, Commissioner
FDA Dockets Management Branch
Attn: Docket No. 99N-4282
5630 Fishers Lane, Room 1061
Rockville, MD 20852

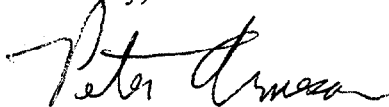
Dear Ms. Henney:

Please stop the madness of untested, unlabeled genetically engineered food.

Europeans may be just as greedy as Americans, but they're not insane.

For the sake of my grandchildren and yours, please listen to your conscience.

Sincerely,



PS. I support the lawsuit:
Alliance for Bio-Integrity v. Shalala
Docket No. 98-1300 (CKK).

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Unlabeled, untested... and you're eating it.

In secret, genetically engineered foods are showing up on American grocery shelves. Though other countries now label biotech foods, the U.S. FDA still does not require labels or safety tests. Don't you have the right to know what's in your food? And if it's safe for your family?

You have the right to know if your baked potato contains bacteria genes...or if the tomato in your salad has genes of viruses spliced in. But at the very place where you encounter genetically engineered (GE) products—your local grocery store—there is silence.

The Food and Drug Administration (FDA) and the biotechnology industry have prevented the labeling of GE foods, effectively subverting your right to know! And so, every day, millions of American infants, children and adults eat genetically engineered foods without their knowledge.

Are these unlabeled foods dangerous? Nobody knows. The FDA refuses to require any safety testing of genetically engineered foods. This, despite the fact that there is significant scientific evidence that inserting novel genes into foods can sometimes create dangerous toxins. For example, this is the possible cause of the thousands of illnesses, and deaths from the GE food supplement L-tryptophan several years ago. Failure to require testing or labeling of GE foods has made millions of consumers into guinea pigs, unknowingly testing the safety of dozens of gene altered products.

Public opinion

There is no doubt of the public's views. Opinion polls consistently show that more than 90% of Americans support the labeling of genetically engineered foods. A 1999 Time poll revealed that close to 60% would avoid such foods if they were labeled. And last year more than 280,000 angry consumers protested the Clinton administration's proposal on organic food standards that would have allowed genetically engineered foods to be certified as "organic." Little wonder that the biotechnology industry is fighting to stop labeling. If consumers knew what was in these foods, there's a good chance they wouldn't buy them.

By its policy of "no labeling" of GE foods, the U.S. has become a rogue nation. The European Union has passed a law that requires labeling of genetically engineered foods. Meanwhile, Canada and the European Union have banned the use of genetically engineered bovine growth hormone (rBGH) in the production of milk and dairy products. But the Clinton administration, the FDA, and the biotech food companies continue to stonewall the American public.

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To help overcome the government's irresponsible policy, we are publishing on this page a partial list of foods that have been genetically modified. Should you be concerned about genetically engineered foods? Yes, you should. According to documents recently released after a court order, even scientists from

the Food and Drug Administration have known of some potential hazards from the genetic engineering of foods, dating as far back as 1991.

The following is a list of several potential dangers from the genetic engineering of foods. While there have been no tests so far conclusively establishing that genetically engineered foods are harmful to humans, the potential dangers are significant enough to mandate long-term independent testing of GE food products before release into supermarkets.

Toxicity. According to some FDA scientists, the genetic engineering of food may bring "some undesirable effects such as increased levels of known naturally occurring toxicants, appearance of new, not previously identified toxicants, increased capability of concentrating toxic substances from the environment (e.g., pesticides or heavy metals), and undesirable alterations in the levels of nutrients." In other words, scientists from the FDA itself suspect that genetic engineering could make foods toxic.

Allergic reaction. FDA scientists also warn that genetically engineered foods could "produce a new protein allergen" or "enhance the synthesis of existing plant food allergens." And a recent study in the New England Journal of Medicine showed that when a gene from a Brazil nut was engineered into soybeans, people allergic to nuts had serious reactions. Without labeling, people with certain food allergies will not be able to know if they might be harmed by the food they're eating.

Antibiotic resistance. Many GE foods are modified with antibiotic resistant genes; people who eat them may become more susceptible to bacterial infections. Commenting on this problem, the British Medical Association said that antibiotic resistance is "one of the major public human health threats that will be faced in the 21st century."

Cancer. European scientists have also found that dairy products from animals treated with bovine growth hormone (rBGH) contain an insulin-like growth factor that may increase the risk of breast cancer, as well as prostate and colon cancer.

Immuno-suppression. Twenty two leading scientists recently declared that animal test results linking genetically engineered foods to immuno-suppression are valid.

Other concerns

Unlabeled genetically engineered foods pose more than just health threats. For millions of people, the consumption of GE foods may violate their religious and ethical principles. For example, vegetarians try to avoid all animal food; but without labeling they can't be sure that animal genes have not been inserted into their vegetables. Jews and Muslims have rigid dietary laws against eating certain animals, yet their tomatoes or lettuce may one day contain pig genes. Don't they have the right to know?

And what of the suffering of genetically altered animals? One GE "super pig" was unable to walk or stand. A GE "super salmon" had a monster head and couldn't swim, eat, or breathe properly. There are hundreds of such outcomes.

There are still broader ethical concerns. More than two dozen genes from human beings have already been engineered into various animals. If we eat them, can we call it cannibalism?

Despite all these concerns, and many more, the government has decided it doesn't want you to know what's in the food you're eating. Clearly, the reason is the constant pressure from the biotech food industry. The Clinton

administration seems incapable of resisting this pressure. But you can resist it. Don't let your children continue to be the guinea pigs in this experiment. Here are some things you can do.

What you can do

First, clip out the list of GE foods, take it with you to your supermarket and discuss it with the management. Second, buy certified organic foods, whenever possible. Third, support the movement demanding long-term independent safety testing and labeling of genetically engineered foods. Inquire with the organizations below about participating in legal actions, petitioning of public officials, and public protests. For more information, please call us at the number below.

PARTIAL LIST OF GENETICALLY ENGINEERED FOODS

This is a list of processed foods that tested positive for genetically engineered ingredients (September 1999). These tests were not "safety" tests; they were only to establish the presence of unlabeled genetically engineered ingredients.

- Frito-Lay Fritos Corn Chips
- Bravos Tortilla Chips
- Kellogg's Corn Flakes
- General Mills Total Corn Flakes Cereal
- Post Blueberry Morning Cereal
- Heinz 2 Baby Cereal
- Enfamil ProSobee Soy Formula
- Similac Isomil Soy Formula
- Nestle Carnation Alsoy Infant Formula
- Quaker Chewy Granola Bars
- Nabisco Snackwell's Granola Bars
- Ball Park Franks
- Duncan Hines Cake Mix
- Quick Loaf Bread Mix
- Ultra Slim Fast
- Quaker Yellow Corn Meal
- Light Life Gimme Lean
- Aunt Jemima Pancake Mix
- Alpo Dry Pet Food
- Gardenburger Hamburger Style
- Boca Burger Chef Max's Favorite
- Morning Star Farms Better'n Burgers
- Green Giant Harvest Burgers (now called Morningstar Farms)
- McDonald's McVeggie Burgers
- Ovaltine Malt Powdered Beverage Mix
- Betty Crocker Bac-Os Bacon Flavor Bits
- Old El Paso Taco Shells
- Jiffy Corn Muffin Mix

Sources: Genetic ID (an independent testing firm) and Consumer Reports (September 1999).

By December 1998, the U.S. government had approved the commercial sale of genetically engineered varieties of the following whole foods. No labeling or long-term safety tests were required. (According to The New York Times, about half of all soybeans and a third of all corn planted this year in the U.S. were genetically engineered.)

- Canola (oilseed rape)
- Chicory, red hearted (Radicchio)
- Corn
- Cotton
- Papaya
- Potato
- Soybean
- Squash
- Tomato

Source: Union of Concerned Scientists

A high percentage of the following ingredients have been made from genetically engineered plants, and are commonly found in processed foods.

- Soy flour
- Soy oil
- Lecithin
- Soy protein isolates and concentrates
- Corn flour
- Corn starch
- Corn oil
- Corn sweeteners & syrups
- Cottonseed oil
- Canola oil

Center for Food Safety
Foundation on Economic Trends
Food First / Institute for Food & Development Policy
Greenpeace USA
Friends of the Earth
Council for Responsible Genetics
International Center for Technology Assessment
Organic Consumers Association
Institute for Agriculture & Trade Policy
Mothers for Natural Law
Sierra Club
Consumer's Choice Council
Edmonds Institute

Food & Water
International Forum on Food and Agriculture
Pesticide Action Network
Rural Vermont
U.S. Public Interest Research Group
Center for Ethics and Toxics
Council of Canadians
Mothers & Others for a Livable planet
International Society for Ecology and Culture

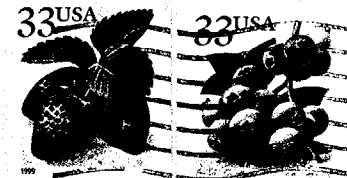
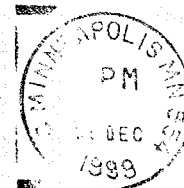
Signers are all part of a coalition of more than 60 non-profit organizations that favor democratic, localized, ecologically sound alternatives to current practices and policies. This advertisement is #2 in the Genetic Engineering series. Other ad series discuss the extinction crisis, economic globalization, industrial agriculture and megatechnology. For more information, please contact:

Turning Point Project, 310 D St. NE, Washington, DC 20002
1-800-249-8712 • www.turnpoint.org • email: info@turnpoint.org



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